

Remarks

This is intended as a full and complete response to the Office Action dated November 14, 2005, having a shortened statutory period for response extended one month set to expire on March 14, 2006. Claims 1-71 are pending in the application. Please reconsider the claims pending in the application for reasons discussed below.

Election/Restrictions

During a telephone interview with the Examiner on November 4, 2005, a provisional election was made with traverse to prosecute the invention of group 1, claims 1-60. The election is hereby affirmed without traverse.

Claim Rejections Under 35 USC § 102

The Examiner rejected claims 1, 25, 27, 28, 56, 58, 59, and 60 under 35 U.S.C. § 102(e) as being anticipated by *Grant, et al.*, US 6,691,781. In response, Applicants have amended claims 1, 27, and 28. Additionally, Applicants have cancelled claims 25, 56, 58, 59, and 60.

As amended, claim 1 includes the limitation of allowing produced gas to flow from the formation and power a liquid pump and carrying gas and liquid from the pump towards surface in separate fluid streams, wherein the formation supplies the liquid and the gas. As amended, claim 27 includes the limitation of allowing produced gas to flow from the formation and power a liquid pump once the level of liquid in the well has fallen below a predetermined level. *Grant, et al.* does not show that the produced gas from the formation powers a liquid pump. Rather, *Grant, et al.* clearly states that the pump is powered by pressurized liquid delivered from the surface. (See *Grant et al.*, col. 7, lines 11-14 and lines 42-44) As amended, claim 28 includes the limitation of claim 31 which the Examiner indicated as allowable in section 12 of the office action.

As the foregoing illustrates, *Grant, et al.* fails to teach or disclose all the limitations of claims 1, 27, and 28. This failure precludes *Grant, et al.* from anticipating claims 1, 27, and 28. Therefore, Applicants respectfully request the 102(e) rejection of claims 1, 27, and 28 (and the claims depending therefrom) be removed and the allowance of the same.

The Examiner rejected claims 28, 56, 58, 59, and 60 under 35 U.S.C. §102(b) as being anticipated by *Burd, et al.*, US 6,026,904. In response, Applicants have amended claim 28. Additionally, Applicants have cancelled claims 56, 58, 59, and 60.

As amended, claim 28 includes the limitation of claim 31 which the Examiner indicated as allowable in section 12 of the office action. For this reason, Applicants believe that claim 31 is in condition for allowance. Therefore, Applicants respectfully request the 102(b) rejection of claim 28 and the claims depending therefrom be removed and the allowance of the same.

The Examiner rejected claims 1, 25, 27, 28, 56, 58, 59, and 60 under 35 U.S.C. §102(b) as being anticipated by *Soderberg*, US 4,565,496. In response, Applicants have amended claims 1, 27, and 28. Additionally, Applicants have cancelled claims 25, 56, 58, 59, and 60.

As amended, claim 1 includes the limitation of allowing produced gas to flow from the formation and power a liquid pump and carrying gas and liquid from the pump towards surface in separate fluid streams, wherein the formation supplies the liquid and the gas. As amended, claim 27 includes the limitation of allowing produced gas to flow from the formation and power a liquid pump once the level of liquid in the well has fallen below a predetermined level. *Soderberg* does not show that the produced gas from the formation powers a liquid pump. Rather, *Soderberg* clearly states that the pump is powered by pressurized liquid delivered from the surface. (See *Soderberg*, col. 3, lines 50-55) As amended, claim 28 includes the limitation of claim 31 which the Examiner indicated as allowable in section 12 of the office action.

As the foregoing illustrates *Soderberg* fails to teach or disclose all the limitations of claims 1, 27, and 28. This failure precludes *Soderberg* from anticipating claims 1, 27, and 28. Therefore, Applicants respectfully request the 102(b) rejection of claims 1, 27, and 28 (and the claims depending therefrom) be removed and the allowance of the same.

Allowable Subject Matter

The Examiner objected to claims 13, 21, 31, 38-42, 46, 52, and 54 as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claims and any intervening claims. In response, Applicants have rewritten claims 13, 38-42, 52, and 54 as new claims 72-79, respectively. Applicants believe that new claims 72-79 are in condition for allowance and respectfully request the same. Further, as discussed above, claim 31 has been added to claim 28. Additionally, claim 21 depends from claim 1 and claim 46 depends from claim 28 and are allowable for at least the same reasons as claims 1 and 28.

New Claims

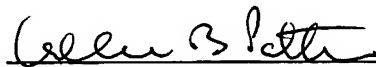
New claims 80-81 have been added to define aspects of the present invention. Applicants submit that no new matter has been added. Further, Applicants believe that the references cited by the Examiner do not disclose a method of kicking off a gas-producing well containing a liquid, the method comprising pumping a gas into the well to force the liquid lying in the well back into a formation, allowing the gas and a produced gas to flow from the formation to power a liquid pump and carrying gas, and liquid from the pump, towards surface in separate fluid streams, as recited in new claims 80-81. Therefore, Applicants believe that new claims 80-81 are in condition for allowance and respectfully request the same.

Conclusion

In conclusion, the references cited by the Examiner, alone or in combination, do not teach, show, or suggest the invention as claimed.

Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,



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